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November 8, 2019

VIA ECF AND HAND DELIVERY

Hon. Richard J. Berman
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

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The Govt's letter of 11/9/19 is consistent with the Court's ruling of 11/6/19.
SO ORDERED: Date: <u>11/12/19</u> <u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We write on behalf of Defendant Harald Joachim von der Goltz respectfully to request clarification of the Court's scheduling order, Dkt. No. 138. At the conference on Wednesday, November 6, we noted the Court's individual practice requiring the government to produce all material subject to *Giglio v. United States*, 405 U.S. 150 (1972), 30 days prior to trial, and we requested that, given the intervening holidays, the Court require the government to make disclosures pursuant to both *Giglio* and 18 U.S.C. § 3500 earlier than 30 days prior to trial. The Court's scheduling order requires production of § 3500 material from unindicted co-conspirators six weeks prior to trial. Dkt. No. 138, at 2 (issue #5). We respectfully request that the Court similarly order production of all *Giglio* and § 3500 material in its possession on that same date, that is, six weeks prior to trial.

The government has not agreed to produce all *Giglio* material earlier than the Court's standing 30-day deadline and has not agreed to a deadline for production of § 3500 material.

Respectfully submitted,

/s/ William Burck
 William Burck

cc: All counsel of record (by ECF)

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